

## Corporation for National and Community Service

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**Policy Number:** OGPO-2012-01-1

**Effective Date:** March 14, 2013

**Revision Number:** 1

**Subject:** Communicating with Applicants, Potential Applicants, and Current Grantees during the Grant Application Review Process (GARP)

Purpose: This policy is designed to maintain the integrity of the CNCS grant application review and selection process and ensure consistency in all staff communication with grantees, applicants, and potential applicants during GARP.

Who is Covered: All CNCS staff, in particular, staff who participate in GARP for grant competitions, including program directors and senior managers.

Policies Replaced: This policy supersedes Policy OGPO-2012-01 and the guidance issued jointly by Robert Velasco II, as the Acting Chief of Program Operations, and Wilsie Y. Minor, Acting General Counsel, on February 18, 2011, entitled “Communicating with Grantees and Applicants during the Grant Application Review Process (GARP).”

Originating Office: Office of Grants Policy and Operations

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**Approved By:**



**Asim Mishra**  
**Chief of Staff**

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**Communicating with Applicants, Potential Applicants, and Current Grantees during the  
Grant Application Review Process (GARP)**

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## **Corporation for National and Community Service**

### **Communicating with Applicants, Potential Applicants, and Current Grantees during the Grant Application Review Process (GARP)**

#### **What is the purpose of this policy?**

The purpose of this policy is to maintain the integrity of the CNCS grant application review and selection process by ensuring and establishing guidelines for consistency in all staff communication with grantees, applicants, and potential applicants during the Grant Application Review Process (GARP).

#### **What is the scope of this policy?**

For the purpose of this policy, the scope of GARP refers to the comprehensive process that commences with developing and publishing a Notice of Funding Opportunity or Availability (*Notice*), followed by outreach, application submission, and the review of applications. The process ends with making and announcing funding decisions.

This policy applies to all CNCS grant competitions that include new or recompeting applications for which the review process includes External Peer Review, Staff Review, or both, and that result in new or recompeting grant awards, including cooperative agreements. In addition, this policy applies to any communication related to the grant review and selection process for a given competition.

This policy does not apply to processes that result in continuation awards; non-competitive grants and awards, including VISTA cost-share awards; memoranda of understanding or agreement; and NCCC sponsor agreements or contracts.

#### **To whom does this policy apply?**

This policy applies to all CNCS staff, and in particular, those who participate in GARP for grant competitions. This policy is also applicable to all program directors and managers.

All CNCS staff communicating with applicants, potential applicants, and current grantees must comply with this policy. Violation of this policy will result in appropriate disciplinary actions being taken.

The Office of General Counsel and the Office of Grants Policy and Operations (OGPO) provide guidance about this policy. Other offices may be consulted as needed.

#### **What is the rationale for this policy?**

External stakeholders could perceive an unfair advantage if staff discuss application status and content prior to award. If staff answer questions or otherwise communicate directly with applicants about their applications, follow-up questioning and even legal challenges could occur. These questions and challenges could impede or halt the timely execution of GARP.

### **How is staff communication with existing grantees handled?**

During GARP, CNCS staff will continue to support, manage and monitor current grants in accordance with all applicable laws and regulations. Staff who conduct check-ins with current grantees (via in-person or phone conversations) and conduct monitoring visits may continue to do so during GARP. In both cases, communications should cover the standard content and provide the standard level of support.

For all programs covered by this policy, if grantees request in-person meetings during GARP, CNCS staff may meet with them so long as there is no discussion of the status or content of pending new or re-competing applications.

### **How is communication handled with all applicants and potential applicants?**

In order to make the application process accessible and support applicants through the submission process, CNCS staff may provide the following information to applicants:

- The *Notice* and Application Instructions – published on the CNCS website and made available in accessible format upon request to accommodate persons with special needs
- Technical Assistance (TA) – publically announced and provided to potential applicants via conference calls prior to the application deadline
- Frequently Asked Questions (FAQs) – published for most competitions
- Point of contact – email and voice mailboxes dedicated and publicly announced in the *Notice* for each competition
- eGrants NOFA – announced when it is open to the public for electronic application submission
- National Service Hotline – contact information and business hours are shared with applicants to provide them support for submission of their applications via eGrants
- Press Releases – distributed as part of each *Notice* outreach/communication plan

These communications are permitted in order to ensure that all applicants have access to the same information. Staff is allowed to discuss information that is publicly available and must refer applicants to relevant official written materials whenever possible.

During GARP, CNCS staff, specifically program staff, play a key role in *Notice* outreach and technical assistance activities. Outreach is conducted equally to all types of eligible organizations.

Staff may explain to a prospective applicant the content and requirements of the *Notice*. Staff may conduct outreach to potential, new, re-competing, and continuation applicants via a variety of methods, including calls, webinars, presentations, in-person, and written materials. In all outreach interactions with prospective applicants, CNCS staff must ensure that participants are not given information that would give them an unfair advantage in the competition. Any questions that are asked and answered which may be relevant to other possible applicants should be shared with everyone as FAQs posted online or other means of distribution.

Office of General Counsel (OGC) clearance is not required to explain the *Notice* to applicants. However, the person or office planning to conduct a meeting should consult with OGC prior to the meeting, in particular in the case of high-profile meetings involving program directors, the CEO, and/or other senior managers.

Staff may conduct Training and Technical Assistance calls prior to the application deadline to review application instructions, content and requirements of the *Notice*, and CNCS policies applicable to the specific competition. New questions that arise from such calls, and answers given in response to those questions, should be made available to all parties by revising and reposting the FAQs. As appropriate, responses to questions from emails and mailboxes will be added to the FAQs, and must be cleared by OGC prior to posting. Responses to inquiries must rigorously adhere to a practice of responding to all questions by referencing the *Notice*, the FAQs, CNCS regulations or policy, or applicable law.

During GARP, specific communications related to a specific application between program and/or grant staff and applicants may take place as part of the Applicant Clarification process, which is the last stage of Staff Review. The purpose of Applicant Clarification is to request clarifications from the list of applicants recommended for clarification on certain aspects of the application in order to assist CNCS staff in making final funding decisions.

During all applicant clarification communications, CNCS staff must adhere to the programmatic and budgetary components identified and approved by the Program Office and/or the Grant Office as needing to be clarified.

### **Can targeted outreach be conducted to underrepresented and priority populations and groups?**

This policy allows targeted outreach to underrepresented and priority populations as determined by CNCS. The information conveyed should conform to this policy.

### **What are the requirements for documenting communications?**

Communication with applicants takes place after the *Notice* is published, prior to the deadline, and during GARP. Each program is responsible for establishing a communication process to ensure that GARP-related communication with applicants and potential applicants is documented. At the minimum:

- Inquiries related to the competition received via dedicated e-mail boxes for each competition must be saved and responses to applicants provided in writing from the dedicated e-mail boxes.
- Clear and understandable inquiries received via dedicated voice mail number for each competition must be documented. Specifically, caller name and organization, date of the call, inquiry, and response. Responses in writing to phone inquiries should be sent using the dedicated e-mail boxes.
- Inquires received via social media will be forwarded to the designated e-mails boxes and responded to from there.

### **What communication is not allowed?**

In order to ensure fairness and avoid perceived or potential unfair advantages to any particular applicant during GARP, CNCS staff must adhere to the following policies:

- Do not provide applicants with substantial assistance about an open grant competition on an individual basis that will provide them with unfair advantage. For example, while an extensive number of hours providing programmatic technical assistance to a particular applicant may be considered substantial assistance that provides an unfair advantage, substantial technical assistance with eGrants may not.
- Do not review or provide comments on applications prior to the deadline.
- Do not provide technical assistance to an applicant other than what is published in the *Notice* or has been made available to the public or will be made available to the public via updated FAQs.
- Do not discuss the content of an applicant or grantee's application, speak one-on-one with applicants about what should or should not be written or included in an application, provide any information concerning the assessment of an application, or provide information concerning funding for any application submitted to CNCS for the grant competition.
- Do not disclose the status of the CNCS's internal decision-making process, including the tentative timeline, or speak about any internal process, except what has been made available to the public.
- Promptly report to the Designated Agency Ethics Official any offer of a gratuity from an applicant.

### **What extenuating circumstances might justify an exception to the communication parameters with applicants and potential applicants established in this policy?**

There are no predetermined exceptions to this policy. Exceptions, when and where appropriate, will be based on the facts surrounding a request for an exception and will be determined on a case-by-case basis. Before an exception is granted, OGPO and OGC concurrence is required. The program will document the rationale for the exception and file it as part of the grant competition records.

### **How does CNCS handle invitations to its staff from applicants or potential applicants to participate in meetings, conferences and other events?**

During GARP, it is especially important to vet all invitations to senior staff to participate in meetings, conferences, and other events through OGC, particularly in cases of high-profile meetings involving program directors, the CEO, and other senior managers. If participation is permitted, staff should not answer questions about or discuss the status or content of pending applications, or results from the review process, or any other information about the competition that is not available to the public.

### **What is the communication plan related to this policy?**

The Policy Coordinator will inform all CNCS staff when this policy is approved and posted on the Intranet. OGPO will disseminate this policy via OGPO's GARP page on the Intranet.

This policy will be published on [www.nationalservice.gov](http://www.nationalservice.gov), communicated to prospective applicants during training and technical assistance calls for each grant competition, included in Frequently Asked Questions related to each grant competition, and referenced in instances where an applicant or grantee may request certain information relating to a grant competition.

### **What is the training plan related to this policy?**

As needed, OGPO will update the policy orientation session available to all CNCS staff through the Learning Management System, in order to ensure alignment with policy revisions. This training is particularly designed for staff who participate in GARP for grant competitions, including program directors and senior managers.

OGPO will develop and deliver a presentation to leadership and special advisors, in particular those new to the agency, when the first NOFO for a fiscal year is released.

Program Directors for units that conduct grant competitions are responsible for ensuring that all staff who participate in GARP comply with this training on an annual basis. Each program/unit is encouraged to coordinate with OGPO for additional training to their staff.